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*Attorney for ONORIO RAMOS*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ONORIO RAMOS,

Plaintiff,

vs.

SABLES, LLC, a Nevada limited liability company; WILMINGTON FINANCE, INC., a Delaware corporation; DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR GSAMP TRUST 2007-HSBC1 MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2007-HSBC1; DOES I through X and ROE BUSINESS ENTITIES I through X, inclusive,

Defendants.

Case No.: 2:25-cv-00776-APG-BNW

**STIPULATION TO EXTEND TIME FOR PLAINTIFF, ONORIO RAMOS, TO FILE RESPONSE TO DEFENDANT, DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR GSAMP TRUST 2007-HSBC1 MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2007-HSBC1'S, MOTION TO DISMISS AMENDED COMPLAINT [ECF 40]**

**(FOURTH REQUEST)**

Defendant, DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR GSAMP TRUST 2007-HSBC1 MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2007-HSBC1 ("Deutsche"), and Plaintiff, ONORIO RAMOS ("Ramos"), stipulate that Ramos shall have up to and including October 30, 2025, to file his response to Deutsche's Motion to Dismiss Amended Complaint, filed September 10, 2025, ECF 40, Deutsche shall have up to and including November 14, 2025 to file its reply. Good cause exists for this extension because Plaintiff's counsel, who is continuing to work remotely outside of the jurisdiction tending to a family health matter, experienced

1 a full power outage on October 21, 2025 for approximately 6 hours which has caused incremental  
2 issues with his WORD program. Upon completing on October 29, 2025 Plaintiff's response to  
3 Defendant, Wilmington Finance, Inc.'s, motion to dismiss amended complaint [ECF 38] ---wherein  
4 the response will be filed on October 29, 2025---, Plaintiff's counsel's WORD program unexpectedly  
5 "forced quit" and shut down and, therefore, has impeded the finalization of Plaintiff's response for  
6 filing on October 29, 2025.

7 This stipulation is not intended to cause any delay or prejudice to any party.

8 **IT IS SO STIPULATED.**

9 DATED this 29<sup>th</sup> day of October, 2025.

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11 **HONG & HONG LAW OFFICE**

12 */s/ Joseph Y. Hong*

13 Joseph Y. Hong, Esq. (State Bar No. 005995)  
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**AKERMAN LLP**

*/s/ Scott R. Lachman*

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*Attorneys for DEUTSCHE BANK NATIONAL  
TRUST COMPANY*

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19 **IT IS SO ORDERED.**

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22 **ANDREW P. GORDON**  
23 **CHIEF UNITED STATES DISTRICT JUDGE**

24 DATED: October 30, 2025